

**ORIGINAL**  
**TALTON**  
Communications

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January 28, 2010  
Via Electronic Mail

Docket Control Center  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

**RE: Talton Communications, Inc.**  
**DN T-20717A-09-0578: Application - Short Form for Pay Telephone Providers**

Dear Sir/Madam:

The original and thirteen (13) copies of this letter are submitted to address concerns and to provide clarification to information provided to you by others. Talton Communications, Inc. ("Talton") was recently awarded the Detainee Phone System contract by the Immigration and Customs Enforcement ("ICE") division of the Department of Homeland Security to provide telecommunications service for detainees in ten states including Arizona. A complex and detailed schedule was prepared to effect the planning and installation of equipment and service at seventeen separate facilities. One ICE facility is located in Arizona and was among the first to be installed. This was done on or about November 20, 2009.

Talton should have but did not realize until December 2009 that intrastate certification would be required. Although the majority of traffic is jurisdictionally interstate and international, there is a small amount of intrastate calling.

Immediately upon discovery, I contacted Technologies Management, Inc., a telecommunications regulatory consulting firm, to obtain assistance with regulatory compliance. Talton's application was filed with the Commission on December 23, 2009. The cover letter with the application explained Talton's award of the ICE contract, the fact that installation had taken place and requested expedited handling.

Talton is a small company and the ICE contract is the first of such size that Talton has been awarded. Despite best efforts there were some initial billing errors. When those errors were brought to my attention I took immediate action to have them corrected, and to ensure that such will not happen again.

ICE has a vested interest in the establishment of enhanced telecommunications security features at its facilities such as voice recording, biometrics (voice verification software), and PIN administration that were not available under the prior contract. ICE wants these features in place in its Arizona and all of its facilities given current national security concerns.

I am now very aware that to provide Arizona intrastate service without the requisite authority is a violation of Commission rules, and I sincerely regret my lack of understanding of regulatory requirements. I pledge to remain in full compliance going forward if Talton's application for authority is granted.

I would like to point out that Talton's proposed rates are extremely low, lower than those charged to detainees under the previous contract. Talton believes that its proposed rates and services will provide



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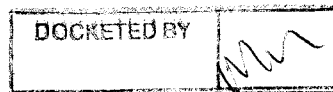
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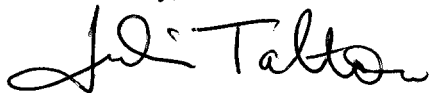
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detainees and their friends and families with the kind of consumer-friendly service that the Commission desires. As noted above, Talton's system also provides ICE facility management with enhanced security features that are important to have in place.

I sincerely hope that Talton's application will be given expeditious consideration. I am willing and able to respond to any questions you may have and would appreciate your directing inquiries regarding this matter to my consultant Robin Norton at (407) 740-3004 or via email at [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Julius Talton". The signature is fluid and cursive, with the first name "Julius" written in a more stylized, connected manner to the last name "Talton".

Julius Talton, President  
Talton Communications, Inc.

cc: Robin Norton, TMI